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6 Attorney for Maria Magdalena Mendoza
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8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,
11 Plaintiff,
12
13 v.
14 MARIA MAGDALENA MENDOZA,
15 Defendant.

Case No. 2:20-cr-00212-RFB-BNW

**STIPULATION TO CONTINUE
EVIDENTIARY HEARING**
(Second Request)

16
17 IT IS HEREBY STIPULATED AND AGREED, by and between Jason Frierson, United
18 States Attorney, and Eric C. Schmale, Assistant United States Attorney, counsel for the United
19 States of America, and Rene L. Valladares, Federal Public Defender, Brian Pugh, Assistant
20 Federal Public Defender, counsel for Maria Magdalena Mendoza, that the evidentiary hearing
21 currently scheduled for November 30, 2022 at 9:00 a.m., be vacated and set to a date and time
22 convenient to this Court, but no sooner than sixty (60) days.

23 The Stipulation is entered into for the following reasons:

24 1. The parties are trying to resolve the case through negotiations and are
25 investigating factual issues relevant to the terms of the proposed plea agreement. Under the
26 proposed plea agreement, Ms. Mendoza would waive her right to pursue any pretrial motions
that have been or could be filed, including her motion to suppress.

1 2. Counsel for the defense is on annual leave on the date of the hearing.

2 3. The parties request additional time to complete negotiations and resolve the case
3 by plea agreement.

4 4. The parties agree to the continuance. The defendant is not incarcerated and does
5 not object to the continuance.

6 This is the second stipulation to continue filed herein.

7 DATED this 16th day of November 2022.

8
9 RENE L. VALLADARES
10 Federal Public Defender

 JASON M. FRIERSON
 United States Attorney

11 By /s/ Brian Pugh

 By /s/ Eric Schmale

12 BRIAN PUGH
13 Assistant Federal Public Defender

 ERIC C. SCHMALE
 Assistant United States Attorney

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 MARIA MAGDALENA MENDOZA,

7 Defendant.
8

Case No. 2:20-cr-00212-RFB-BNW

ORDER

9 ORDER

10 IT IS THEREFORE ORDERED that the evidentiary hearing currently scheduled for
11 November 30, 2022, at the hour of 9:00 a.m., be vacated and continued to
12 February 1, 2023 at the hour of 9 : 00 a .m.

13 DATED this 21st day of November, 2022.

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15 RICHARD F. BOULWARE, II
16 United States District Judge
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